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Sent: Wednesday, August 31, 2005 2:58 PM
To: NIOSH Docket Office
Cc: Cloonan, Terrence K.
Subject: Ref: NIOSH Docket - 052

Docket Comments
052 - Aug 2005...

Enclosed please find Draeger Safety's comments for the CBRN Guidance Documents. If there are any questions, please contact me.

(See attached file: Docket Comments 052 - Aug 2005.doc)

Regards

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August 31, 2005

NIOSH Docket Office
Robert A. Taft Laboratories
M/S C34
4676 Columbia Parkway
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Subject: NIOSH Docket 052

To Whom It May Concern:

The following comments from Draeger Safety, Inc. are being provided for the following draft Guidance Documents:

- NIOSH-Approved CBRN SCBA User's Guide Training Aid: July 15, 2005
- Guide to the Technical Use of Chemical, Biological, Radiological, and Nuclear (CBRN) Open-circuit, Pressure-Demand, Self-contained Breathing Apparatus (SCBA) Respirators Certified under 42 CFR, Part 84.
- Interim Guidance on the Use of Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece, Air-Purifying Respirators / Gas Masks Certified under 42 CFR, Part 84.

Draeger Safety would like to thank NIOSH for the opportunity to provide our comments on the above-mentioned documents. The documents, in general, will serve as a major benefit user community in promoting more awareness concerning the use of this equipment for CBRN emergency response incidents.

Comments

NIOSH-Approved CBRN SCBA User's Guide Training Aid - July 15, 2005:

1. Page 7, B), Corrections, 3rd bullet point: "Ensure no debris is in the threads"

   Suggested rewording to: "Ensure no debris is in the connection / docking port"

   Substantiation: Not all second stage regulators utilize threaded connections to secure them to the facepiece. Currently, Draeger Safety utilizes a "plug-in" second stage regulator.

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Guide to the Technical Use of Chemical, Biological, Radiological, and Nuclear (CBRN) Open-circuit, Pressure-Demand, Self-contained Breathing Apparatus (SCBA) Respirators Certified under 42 CFR, Part 84:

1. Page 24, "CBRN SCBA IS DUAL PURPOSE", 2nd paragraph: We agree that there should be a CBRN SCBA for law enforcement responders (LER) and that the current CBRN SCBA does not meet their needs. Currently, many cities that go out for bids / evaluation of CBRN SCBA also include LER personnel and these groups want to see certain non-essential components removed. Other modifications also include decreasing the visibility of the CBRN SCBA to improve stealth approaches.

2. Page 25, "Heads-Up Display", 3rd paragraph, last sentence: Reword "NFPA 1981 code, 2002 edition" to "NFPA 1981 standard, 2002 edition".

   Substantiation: Consistent wording with the previous references to the document.

3. Page 26, By-Pass Valves for Use in the Event of Regulator Failure: Reword the sentence "By-pass valves expend pressurized air at a higher rate than the second stage regulator and will deplete the air cylinder ~~at a~~ more rapidly."

   Substantiation: Believe this to be a typographical error.

4. Page 28: Paragraphs two and three need to be combined.

5. Page 28, Last paragraph, second sentence: Reword from "New carbon composite cylinders rely...." to "New composite cylinders (fiberglass, Kevlar®, and carbon) rely...."

   Substantiation: SCBA manufacturers do not only have the carbon composite cylinders CBRN approved. Draeger Safety has all three types of composite cylinders approved in addition to the all-metal aluminum cylinder.

6. Page 29, Interchangeability of Cylinder Valves and Cylinder Assemblies on Different SCBA:

   It is our understanding that this draft document was written prior to the July 2005 NFPA meeting for the Technical Committee (TC) on Respiratory Protection Equipment. NIOSH presented a solution on maintaining respirator approvals in the event that cylinders are to be interchanged between SCBA manufacturers as long as the guideline presented were met (Reference Roland Berry Ann letter dated July 7, 2005). If the information contained in this section has changed then the section needs rewritten.

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7. Page 31, last paragraph: Reword the sentence "Liquid HD is known to ~~be~~ aggressively attack...."

   Substantiation: Believe this to be a typographical error.

8. SCBA Facepiece Fit Testing, Page 38 middle paragraph: The discussion of what a fire department does and does not do when they purchase new SCBA's is misleading and implies that fit testing is an after thought. The process of purchasing new SCBA's is a long one in which many aspects are considered. During the evaluation phase, fit testing is performed on the fire department personnel who are participating in the selection process. Fit testing is also a consideration during the development of the purchase specification due of the amount of time and logistics in getting it performed. There are times, once the contract has been awarded, that fit tests begin or during the personnel training process on the new SCBA's fit testing has also been conducted. We suggest that sentences four through seven be reworded to include some of the above information or to be stricken from the section.

9. Page 41, NIOSH Approval Label: Revise second bullet point, second sentence to "Check CBRN agent approval label ..."

   Substantiation: Believe this to be a typographical error.

10. Page 41, NIOSH Approval Label: As a comment, Draeger Safety would require more than just a "phone call" from the customer before we would reissue a replacement approval label. There are too many liability concerns in sending these items to a customer without validating the equipment.

11. Page 52, Service Life of Air Cylinder: Recommend rewording the following sentence concerning carbon composite cylinders. "DOT compliant carbon composite cylinders have a maximum service life of 15 years and are to be re-qualified every five years, as specified in by the DOT exemption issued to the cylinder manufacturer."

    Substantiation: Cylinder manufacturers now have new DOT exemptions that increased the cylinder re-qualification period and are specific to each cylinder manufacturer concerning the implementation dates.

    Comment: Currently, Structural Composites Inc. (SCI) does have a 30-year service life exemption for their carbon composite cylinders with several restrictions / inspections that are required. Currently, it is unknown at this time as to the market acceptance of these cylinders. Reference DOT E-13583 exemption.

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12. Page 65, 4th bullet point: Revise the second sentence to "For this reason, the solitary cylinder without its neck cylinder valve assembly is not required to be tested in NIOSH CBRN SCBA certification trials."

    Substantiation: During SCBA CBRN, testing the cylinder is not included in the test. This rationale for this has been explained on page 27 of this document.

13. Page 65, 4th bullet point: The statement "Compressed 'gas' / air cylinders used with CBRN SCBA are DOT certified and exempted. For this reason, the solitary cylinder without its neck cylinder valve assembly is not required to be tested in NIOSH CBRN SCBA certification trials" is misleading. It can be interpreted that because the DOT has certified the cylinder that it is exempted from being subjected to CBRN testing. A DOT Exemption pertains only to the DOT qualification and certification methods of a specific class of cylinders as noted on page 53. The rational for not CBRN testing the DOT cylinder has been adequately explained on page 27 (5th paragraph).

    We suggest that this statement be clarified and it may be prudent to reiterate the no test rational here also since the test set-up has also been included with this bullet point.

14. Page 74, last paragraph, last sentence: The statement "The need for an emergency release 'button' or similar release device is warranted" should be removed from the text. Current SCBA designs are not difficult to remove. In addition, if the CBRN SCBA should fail in some types of personal protection equipment; i.e.: Level A protection suits; there is more of problem getting out of the suit than it is to remove the SCBA.

15. Page 78, Integration of CBRN SCBA with Protective Suit Ensembles, first paragraph, last sentence: Revise to read, as "NIOSH / NPPTL doe not ~~only~~ certify CBRN protective ensembles...."

    Substantiation: Believe this to be a typographical error since this was explained in the paragraph that NIOSH does not certify suit ensembles.

16. Page 85, CBRN Respirator Use Life, 1st paragraph: Towards the end of this paragraph, there is discussion on decontamination. It requires that equipment is to be double bagged for disposal that contradicts a similar statement on page 78 in "Recommendations for Disposal" which requires that the equipment is to be triple bagged. Please clarify which is the appropriate bagging method once the equipment has been decontaminated.

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17. Comment - Appendix D, Checklist Item #1: This is the first time that a reference to "first due units" has been made throughout the document. Is this a common term for those units that are first on the scene? Is there another term that can be used?

18. Appendix F, References cited and Bibliography: In looking for further information on three references noted in the body of the document there was nothing to be found in this section. Two references [Kreugar, Micheal: November 2004] on pages 63 and 73 are not listed in this section. In addition, [Kennedy, Eugene: November 2004] is not listed.

    We suggest to list these references since they have been cited.

NIOSH Interim Guide on the Use of Chemical, Biological, Radiological and Nuclear (CBRN) Full Facepiece, Air Purifying Respirators / Gas Masks Certified Under 42 CFR Part 84 CBRN APR User Guide

1. Page 16, last paragraph, last sentence: Revise to read "....extra level of protection to ~~ally~~ allow escape from ...."

   Substantiation: Believe this to be a typographical error.

2. Page 18, CBRN APR Approval / Use vs. Industrial APR Approval / Use: The use of CBRN canisters for Industrial use should be permitted since they have been tested and certified for use against the 11 test representative agents (TRA). We can understand the rationale for this when it comes to first responders so that they have the proper respiratory protection equipment on hand when it is needed for a CBRN event. In addition, the Fire Departments Standard Operating Procedures (SOP) should cover the use of this system and as to how it is to be deployed. There may also be incidents that are not related to terrorism; i.e. Industrial Chemical plants, where the use of the CBRN APR may be appropriately used when it is available.

   This requirement also would restrict the manufacturer from offering it for sale to those industrial accounts that may request it for purposes other than CBRN considerations. In many instances, the full facepiece that is approved for CBRN use can also be the identical facepiece that is offered for industrial applications.

   We suggest that this section be reworded to permit industrial use, but that additional wording be included to point out that CBRN use is the primary purpose

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of these respirators. If the respirators are intended for dual-purpose activities then the jurisdiction having the responsibility is to have provisions to ensure that ample supplies be on hand and that masks be serviced, stored and maintained in accordance to the manufacturer's recommendations.

3. Page 19, Canister Interchangeability, 2nd paragraph: Revise the sentence to read as "...standardizing the design requirements for the mechanical connector internal threads, canister external threads..."

   Substantiation: Refer to the APR CBRN standard section 3.1

4. Page 25, Item K: Revise 3rd sentence to read "When positioning a canister in the desired connector, ensure the opposite or center connectors have ~~tighten~~ caps inserted and tightened to prevent leakage."

   Substantiation: Believe this to be a typographical error.

5. Comment: This Guidance document, as compared to the SCBA CBRN Guidance Document, does not go into much detail concerning the use of chemical protection suits, background rationale and design requirements. We suggest, that at a minimum, there should be some discussion concerning the use of chemical protection suits when using the APR CBRN in these environments.

Thank you again for the opportunity to provide comment on these three documents and if there should be any questions concerning these comments please do not hesitate to contact me at 412-788-5685 or via e-mail at Robert.Sell@draeger.com

Sincerely,

Robert Sell

Robert Sell
Sr. Project Mgr., Respiratory Protection

Cc: Bodo Heins – DST
Angus Donaldson - DLtd

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